



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WYC:RMT
F.#2006R00642

271 Cadman Plaza East
Brooklyn, New York 11201

June 28, 2010

By Hand and ECF

Douglas Morris, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Fl.
Brooklyn, NY 11201

By U.S. Mail and ECF

Ronald Kliegerman, Esq.
Kliegerman & Joseph
2 Rector Street, 20th Floor
New York, NY 10006

Re: United States v. Raghunath et al.
Criminal Docket No. 10-70 (JBW)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery with respect to the above-referenced matter. This production supplements the government's April 12, 2010, May 28, 2010, June 7, 2010, June 10, 2010 and June 21, 2010 disclosures.

Enclosed is a compact disk ("CD") containing bank records and other discovery relevant to the above-referenced matter, bearing Bates numbers C000000001 to C000003343. Also stored on that CD, bearing Bates numbers IR000000001 to IR00000003, is a copy of a redacted Federal Bureau of Investigation report reflecting statements made by the defendant Ishwardat Raghunath or information provided by him subsequent to his arrest.

Also enclosed are five CDs labeled 000000017 to 00000021. CD 000000017 contains a copy of a consensually recorded telephone conversation. CD 000000018 contains copies of recorded telephone calls made by defendant Raghunath from the Metropolitan Detention Center. CD 000000019 contains copies of recorded telephone calls made by defendant Raghunath from the Metropolitan Correctional Center. CD 000000020 contains copies

of photographs of certain of the properties relating to the above-referenced matter taken on or about May 21, 2010. CD 000000021 contains copies of photographs taken in connection with execution of the search warrant at 118-15 150th Avenue, South Ozone Park, New York on or about March 15, 2010.

Additionally, and as the government has previously indicated, the government has in its possession numerous computers and portable electronic data storage devices seized during the course of this investigation. You may call me to arrange a mutually convenient time to inspect, copy, and/or photograph the evidence and original documents discoverable under Rule 16.

Finally, the government has been informed by First Choice Copy that the Bates range for the June 21, 2010 production is B00000001 to B000017793. As previously indicated, defendants Halal Ahmed and Phyllis Seemongal may obtain copies of these documents by contacting Joe Meisner at First Choice Copy, telephone number (718) 381-1480, and asking for print job number 26139. As the government has indicated to counsel for defendant Raghunath, the discovery provided to First Choice Copy in this matter cannot be made available to defendant Raghunath until the defendant and his counsel sign the proposed protective order.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Richard M. Tucker
Assistant United States Attorney
(718) 254-6204

Enclosures

cc: Clerk of the Court (JBW) (w/o enclosures)